

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JOSEPH LUCAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO. 23-56-JPG
	)	
BLANKENSHIP CONSTRUCTION CO.;	)	
DOUG BLANKENSHIP; AND	)	
NATHAN MARLEN, individually and in	)	
his capacity as Trustee of the James E.	)	
Marlen and JoAnn Marlen Declaration of	)	
Trust, dated January 27, 2010.	)	
Defendants.	)	

***MOTION TO ADOPT***

NOW Comes the Defendant, Nathan Marlen, individually, and in his capacity as the Trustee of the James E. Marlen and JoAnna Marlen Declaration of Trust dated January 27, 2010, by Bleyer and Bleyer, their attorneys, and for his Motion to Adopt the Defendant, Nathan Marlen's Motion to Bar Testimony (Doc 67), Nathan Marlen's Motion *In Limine* (Doc 66), and Nathan Marlen's Rule 26(a)(3) Pre-Trial Disclosures (Doc 70), says:

1. The Defendant, Nathan Marlen is represented by both Attorney Joseph A. Bleyer of Bleyer and Bleyer, and Attorney John P. Cunningham, of Brown and James, and filed his Motion to Bar Testimony (Doc 67), his Motion *In Limine* (Doc 66), and his Rule 26(a)(3) Pre-Trial Disclosures (Doc 70), by Attorney John P. Cunningham and Attorney Joseph A. Bleyer.

2. That Defendant, Nathan Marlen, individually, and in his capacity as the Trustee of the James E. Marlen and JoAnna Marlen Declaration of Trust dated January 27, 2010, hereby adopts Nathan Marlen's Motion to Bar Testimony (Doc 67), Nathan Marlen's Motion *In Limine* (Doc 66), and Nathan Marlen's Rule 26(a)(3) Pre-Trial Disclosures (Doc 70)

BLEYER and BLEYER

S/Joseph A. Bleyer  
Attorney Registration No. 6193192  
Attorneys for Nathan Marlen, Individually and  
in his capacity as Trustee of the James E.  
Marlen and JoAnn Marlen Declaration of  
Trust, dated January 27, 2010.

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***CERTIFICATE OF SERVICE***

I hereby certify that on May 28, 2024, I served via email a Motion to Adopt on behalf of the Defendant, Nathan Marlen, individually, and in his capacity as the Trustee of the James E. Marlen and JoAnna Marlen Declaration of Trust dated January 27, 2010, to the following:

BRITTON L. ST. ONGE  
POL SINELLI PC  
100 SOUTH FOURTH STREET, SUITE 1000  
ST. LOUIS, MO 63102

THOMAS G. DeVORE  
SILVER LAKE GROUP, LTD  
118 NORTH SECOND STREET  
GREENVILLE, IL 62246

JOHN P. CUNNINGHAM  
BROWN & JAMES, P.C.  
525 WEST MAIN  
SUITE 200  
BELLEVILLE, IL 62220

I hereby certify that on May 28, 2024, I mailed by United States Postal Service, the documents to the following nonregistered participants:

None

S/Joseph A. Bleyer

BLEYER and BLEYER  
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